



# United States Department of the Interior



NATIONAL PARK SERVICE

Grand Canyon National Park

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IN REPLY REFER TO:

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## Memorandum

To: All Employees

From: Superintendent, Grand Canyon National Park

Subject: Cultural Site Information Standard Operating Procedures  
for Grand Canyon National Park

Both the National Historic Preservation Act and the Archaeological Resources Protection Act mandate that Federal agencies only disclose site locations if no harm, theft, or destruction of cultural resources will result from disclosure. The pertinent sections of the acts are as follows:

The head of any Federal agency, after consultation with the Secretary, shall withhold from disclosure to the public, information relating to the location or character of historic resources whenever the head of the Agency or the Secretary determines that the disclosure of such information may create a substantial risk of harm, theft, or destruction to such resources or to the area or place where such resources are located. Section 304, National Historic Preservation Act of 1966, as amended through 1992.

Information concerning the nature and location of any archaeological resource for which the excavation or removal requires a permit or other permission under this Act or under any other provision of Federal law may not be made available to the public under subchapter II of chapter 5 of title 5 of the United States Code or under any other provision of law unless the Federal land manager concerned determined that such disclosure would - (1) further the purposes of this Act or the Act of June 17, 1960 (16 USC 469-469c), and (2) not create a risk of harm to such resources or to the site at which such resources are located. Section 9, Archaeological Resources Protection Act of 1979.

To comply with these mandates, this directive establishes four categories of archeological sites based on the ability of sites to withstand visitor impacts (due to the nature of the sites themselves, active physical protection, and indirect protective mechanisms). Grand Canyon National Park employees may provide

disclosure decisions. The classification, which will list particular sites by name and number, is provided in a separate section to be kept only for reference purposes at the visitor information centers and within appropriate divisions. It is not to be publicly distributed as a guide to sites at Grand Canyon.

## II. Laws and Regulations

The National Park Service is charged by law and regulation to protect the archeological resources under its domain. These laws and regulations are too numerous to reproduce here in their entirety. Instead, two of the most relevant are summarized below.

A. The Archeological Resources Protection Act (ARPA) of 1979 (Public Law 96-95, 16 USC 470) establishes civil and criminal penalties for unauthorized excavation, removal, or damage of archeological resources found on Federal lands. These penalties include forfeiture of vehicles and equipment used in such activities, fines of up to \$100,000, and imprisonment of up to five years for second violations. ARPA further authorizes rewards for information regarding such violations. Additionally, the act provides for withholding archeological site locational information, exempting such information from Freedom of Information disclosure:

"Confidentiality. Section 9.(a) Information concerning the nature and location of any archeological resource...may not be made available to the public under subchapter II of chapter 5 of title 5 of the United States Code or any other provision of law unless the Federal land manager concerned determines that such disclosure would...not create a risk of harm to such resources or to the site at which such resources are located."

B. The National Historic Preservation Act (NHPA), as amended through 1992, establishes procedures for listing significant historical and archeological resources on the National Register of Historic Places. The purpose of this act is to preserve historic resources on both public and private lands, so that "our prehistoric and historic resources can exist in productive harmony and fulfill the social, economic, and other requirements of present and future generations..."

While the National Historic Preservation Act allows for research activities and public enjoyment of historic and archeological resources, Title III, Section 304(a) specifies that the head of a federal agency shall not publicly disclose information about the "location, character, or ownership of a site if such disclosure may:

CULTURAL SITE INFORMATION DISCLOSURE  
STANDARD OPERATING PROCEDURES 8213-001

I. The need for Site Disclosure Standard Operating Procedures

Archeological sites are fragile, non-renewable resources. When objects are removed from their archeological setting or even just moved a short distance from their original location, they may lose much of their scientific value. The spatial distribution of broken pottery around a site, for example, can be used to identify activity areas, date different occupations of the same location, identify high- and low-status residences within a site, and even trace family relationships among the potters. When seemingly useless bits of broken pottery or arrowheads are innocently picked up by souvenir hunters, this crucial contextual information is lost forever. Even such apparently harmless activities as photography, undertaken by people who care about antiquities, can cause damage to sites if the photographer inadvertently tramples cultural deposits and features.

Not all damage to cultural sites is the result of innocence or ignorance: some is the result of intentional destruction by vandals, profit seekers, and hobbyists. At Grand Canyon, rock art has been damaged by illegal camp fires, modern graffiti, and removal of panels from cliff faces. Ancient sites have been plundered by individuals seeking artifacts to augment personal collections or for illegal sale. Such damage not only interferes with ongoing scientific research in the park, but it steals from all Americans. The stone tools, masonry structures, and rock art that visitors unexpectedly find in the backcountry have remained largely undisturbed since their makers left them thousands of years ago. They are an important part of the Grand Canyon experience. Once removed, damaged or destroyed, those artifacts and features are gone forever.

Clearly, if site locations were divulged on demand, the park soon could be systematically stripped of its archeological treasures. Because of the need to protect sites from accidental or intentional damage, park personnel cannot freely disclose to visitors, friends, or relatives the locations of prehistoric features. This is not an arbitrary, self-serving policy; it is the law.

The remainder of this document addresses: 1) specific laws and regulations pertaining to the protection of archeological resources; 2) suggestions on how park personnel may best respond to requests for site location information; 3) fundamentals of site "etiquette"; and 4) presentation of a four-tiered classification of archeological sites, to guide information

locational information only to sites which are regularly interpreted, monitored, stabilized, or otherwise protected from visitor impacts or harm. These sites are specifically designated as Class I and Class II sites in the attached briefing statement, "Site Disclosure Standard Operating Procedures for Grand Canyon National Park."

#### DISCLOSURE CLASSES

Category I - Locations of Class I sites are readily disclosed to the public. Class I sites have a long history of tourist use, are marked on U.S. Geological Survey topographic maps, are described in widely available guide books, are generally known to visitors, and are actively promoted as tourist destinations. Since they receive the greatest impacts from visitors, they receive the greatest direct physical protection to minimize visitor impacts. The site disclosure policy is directly linked to the site physical protection program of the park.

Category II - Class II sites are more fragile and vulnerable to visitor impacts than Class I sites, but they are also well-known to visitors. Visitors may request information about how to find Class II sites but, in addition to receiving locational information, visitors are told how to behave when visiting the sites. For example, at a Class II rock art site, visitors are told how to find the site, and they are told not to touch the rock art or to leave any marks or graffiti on the site. At a Class II structural site, visitors are told to leave artifacts in place, to stay on existing trails across the sites, not to lean or climb on walls, etc. In recognition of the damage visitors inflict on Class II sites, these sites are regularly monitored and patrolled. Some of them are also stabilized.

Category III - Class III sites are the most vulnerable sites in the park. Their locations are withheld from the public to ensure their preservation and protection, as mandated in the National Historic Preservation Act and the Archaeological Resources Protection Act. Locational information about Class III sites is only given out to individuals holding current, valid Archaeological Resources Protection Act permits. While visitors are not told where Class III sites are located, visitors are welcome to discover them on their own, based on the enabling legislation for the park.

Category IV - Class IV sites are officially closed to all visitation. They represent some of the most culturally sensitive and fragile sites in the park. Their locations are withheld from the public to ensure their preservation and protection, as mandated in the National Historic Preservation Act and the Archaeological Resources Protection Act.

- (1) cause a significant invasion of privacy;
- (2) risk harm to the historic resource; or
- (3) impede the use of a traditional religious site by practitioners.

In addition to the federal laws summarized above, the National Park Service has responsibility for preservation of cultural and archaeological resources, as articulated in 36 CFR 2.1 which states (in part):

(a) Except as otherwise provided in this chapter, the following is prohibited:

(1) Possessing, destroying, injuring, defacing, removing, digging, or disturbing from its natural state:

(iii) Nonfossilized and fossilized paleontological specimens, cultural or archaeological resources, or parts thereof.

(5) Walking on, climbing, entering, ascending, descending, or traversing an archaeological or cultural resource, monument, or statue, except in designated areas and under conditions established by the superintendent.

### III. Handling Visitor and Employee Requests

#### A. Researchers

Those wishing to conduct site-disturbing archeological research within the park's boundaries must first obtain an ARPA Permit, as stipulated by ARPA. This permit is issued by the Regional Director only after park and regional office staff have reviewed the merits of a detailed, written research proposal, prepared and submitted by the investigator. After the permit is approved, specific site locational information may be disclosed to the investigator. Individuals requesting more information on the permit application procedure, and those who have been issued a permit and seek access to site files, should be referred to the Park Archeologist. Researchers conducting work that will not disturb archeological materials may submit a proposal directly to the park, through the Division of Resource Management.

#### B. Staff Requests

Employment by the National Park Service does not automatically entitle employees to access site information. Park employees whose jobs require knowledge of specific site locations will be given site location information when it pertains specifically to their assigned duties. Prior to releasing site information, National Park Service staff will be asked to sign a document acknowledging responsibility for site information and maintaining

site confidentiality. Park employees are not at liberty to disclose site information to other park staff without prior approval of the Park Archeologist.

### C. Other Requests

Many requests for precise site locational information are made by persons wishing to visit sites for religious or educational reasons, to satisfy curiosity, or to take photographs. To a limited degree, we can accommodate some of these inquiries by offering directions to sites that are part of active site monitoring and interpretive programs, and to some that are more remotely located but which are well-known and regularly monitored. Those sites for which we will provide locational information are categorized into two classes (see Section V, below), following the system used by some national parks in the Rocky Mountain Region.

Visitors and park staff may be freely given Class I information. By-name requests for Class II sites may be accommodated, but locational information must always be prefaced by an oral review of site etiquette rules.

When visitors or staff request information for Class III sites, they should be told politely that the sites in question are fragile and unable to withstand more than very minimum visitation. Directed by law to protect the sites, the Superintendent has determined that locational information cannot be divulged. The individual handling the request may then volunteer information about Class I sites. Persons persisting in their request for Class II information may be given a copy of the first five pages of this document. Part V (the classification section) is not to be distributed to the public. Park personnel are asked not to provide general area locations or hints. While people are legally free to discover sites on their own, actively aiding them in this endeavor goes against the spirit of park policy and non-disclosure laws. REMINDER: Persons who find or visit sites on their own are not in legal violation UNLESS their activities disturb the sites.

## IV. Site Etiquette

Visitors should be aware that all sites are fragile and must be treated with care and respect. Some guidelines to appropriate on-site behavior are provided here. These guidelines should be communicated to anyone requesting Class II site location information.

1. Refrain from collecting artifacts to turn in to rangers and visitor center staff. Instead, leave the objects in place, make note of the location, and report the find to a ranger or visitor center personnel. Such cooperation is of enormous assistance in site preservation.

2. Take lots of photos, but do not touch, chalk in the outline, or take rubbings or latex molds of rock art. Archaeologists no longer use these destructive techniques to record rock art. Even the slightest touch may leave acids and oils from one's skin on the pigment or rock, and remove tiny grains from the stone. Altering rock art, even with innocent intentions, is a form of vandalism and punishable by law.

3. Walk carefully. When visiting ancient or historic structures, avoid stepping into the rooms or standing and leaning on foundations or walls. Rocks may be dislodged or entire walls may be toppled. Walking in site increases the risk of damaging structural features. It also tramples the soil, destroying or disturbing small artifacts and microscopic biological remains that might otherwise tell scientists a great deal about past conditions.

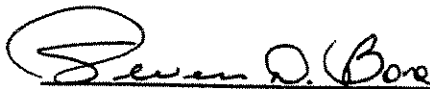
4. Leave all objects, including seemingly insignificant broken bits, in place. Neither remove them from the site nor gather them into a central pile for viewing or photography. The relationships of artifacts to each other and to their natural surroundings are crucial to any archaeological investigation.

5. Writing or scratching graffiti on the walls of a site is vandalism, a violation of ARPA, and punishable by stiff penalties. Please do not try to remove such graffiti in an attempt to restore original conditions. Historical inscriptions and prehistoric rock art might inadvertently be damaged. Repair is a job for trained conservators.

6. Digging in a site, and even collecting surface artifacts or related material from park lands, is strictly prohibited by law and carries stiff penalties.

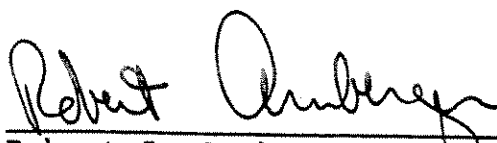
7. Stay on established trails. Pioneering new trails damages soils and vegetation, and can increase erosion of archaeological sites.

Recommended by:

 Date 3/21/95  
Steven D. Bone, Chief of Resource  
and Visitor Protection

 Date 3/18/95  
David L. Haskell, Chief of  
Resources Management

Approved by:

  
Robert L. Arnberger  
Superintendent

3/31/95  
Date